

# Amphenol

Amphenol Corporation

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OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA REGION 7

March 26, 1996

Mr. Paul Little (DRE-8J)  
Chief, Waste, Pesticides and Toxics Division  
Enforcement and Compliance Assurance Branch  
USEPA, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Administrative Order on Consent (AOC) dated November 27, 1990  
Franklin Power Products/Amphenol Corporation  
Franklin, IN  
IND 044 587 848

Dear Mr. Little:

Your March 12, 1996 letter approving our February 9, 1996 Work Plan with modifications was received on March 18, 1996. We are proceeding to implement the Work Plan in accordance with the schedule contained therein. Project status will be discussed in the monthly progress reports although, should unforeseen problems arise, your office will be advised immediately.

Your letter requested that an alternative plan to the June 1994 Work Plan be submitted concurrently with our submittal of the revised CMS report. We believe that some of the work proposed for the supplemental activity now underway would address most, if not all of the questions regarding conditions in Hurricane Creek. Notwithstanding that, I expect that the geological and physical data collection activities will occur early enough in the schedule that we will be able to preliminarily evaluate conditions in the creek and determine what, if any, additional measures are needed. I should note, however, that this particular requirement was not discussed prior to receipt of your letter.

I am also in receipt of the assessment of risks from inorganic soil constituents at the site. While further and more detailed comments may be forthcoming at a later date, some initial comments are provided here.

- The report notes that there may be insufficient data to adequately represent background conditions at the site. I would point out that there were protracted discussions with the EPA regarding the number and placement of background monitoring points. The location and number of samples collected were in accordance with the specific approval of the EPA.

- The assessment of risks report also does not appear to take into account Respondents' statistical evaluation of background vs. site inorganic constituents (contained in a September 22, 1995 letter as Attachment 1 to *Responses to U.S. EPA Comments, Draft Report, Corrective Measures Study for the Former Amphenol Facility, Franklin, IN, March, 1995*). That evaluation for arsenic, beryllium, cobalt and manganese (i.e., those constituents detected at levels above ARARs) concluded that:
  1. Background data for inorganics in background and site soils were lognormally distributed.
  2. There were equal variances for upgradient and site values at a 90% confidence level for all inorganic constituents except beryllium.
  3. Means of the two data sets were not significantly different at a 95% confidence level using Student's t-Test for all inorganics except beryllium.
  4. Since the variance for beryllium values are not equal, the Welch's t-Test was used to evaluate those data sets. The Welch's t-Test determined that the two data sets were not significantly different at a 95% confidence level.

In view of the fact that this analysis was conducted in direct response to an EPA request for further clarification on the presence of inorganic constituents at the site, it should have been provided to the contractor conducting the assessment of risk and should have been specifically discussed in the assessment report.

- The report notes that the use of subsurface samples most often at depths greater than six feet below ground surface (bgs) adds additional uncertainty to the assessment. In fact only three samples of the thirty two collected were less than six feet bgs, most being collected at depths greater than 10 feet. It is my understanding that EPA's own guidance considers it inappropriate to use data from samples taken at or below six feet in a residential exposure assessment. I would appreciate receiving any clarification you may have regarding this issue as well as any EPA guidance regarding the use of residential criteria at an operating manufacturing facility.
- Notwithstanding the above, Table 4 presents risk and hazard calculations which vary only slightly from background risks and which are within ranges generally utilized by EPA. Even as presented, these data do not suggest that inorganic constituents need to be addressed further. The report does not draw any conclusions nor has EPA included its interpretation of the data in the package I received. If such is developed for inclusion in the Final CMS Report package, Respondents should be provided an opportunity to comment.

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Please don't hesitate to contact me should you have any questions or comments regarding the above.

Sincerely,  


Samuel S. Waldo  
Director, Environmental Affairs

cc: J. Michael Jarvis  
J. Keith

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